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City and County of San Francisco

UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

-and-

PACIFIC GAS & ELECTRIC COMPANY,

Debtors,

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Case No.: 19-30088-DM

Chapter 11

**PARTIAL JOINDER OF THE CITY  
AND COUNTY OF SAN FRANCISCO  
TO THE STATUS CONFERENCE  
STATEMENT OF VALLEY CLEAN  
ENERGY ALLIANCE REGARDING  
PRECONFIRMATION ISSUES**

DATE: January 29, 2020  
TIME: 10:00 am  
PLACE: Courtroom 17  
450 Golden Gate Avenue, 16<sup>th</sup> Fl.  
San Francisco, California  
JUDGE: Hon. Dennis Montali

RELATED DOCKET NOS: 5442

The City and County of San Francisco ("**San Francisco**") in the above-captioned chapter 11 cases of Pacific Gas and Electric Company (the "**Utility**") and PG&E Corporation ("**PG&E**" and, together with the Utility, the "**Debtors**"), hereby partially joins, as further described herein, in the Valley Clean Energy Alliance's Status Conference Statement Regarding Preconfirmation Legal Issues (the "**Status Conference Statement**") [Dkt No. 5442].

1 **PARTIAL JOINDER**

2 San Francisco is interested in particular issues raised in the Status Conference Statement as a  
3 municipality that has expressed an interest in acquiring portions of PG&E's electric distribution  
4 system and wishes to continue with those discussions with PG&E, or any successor entity, under  
5 whatever reorganization plan that is confirmed by this court.

6 San Francisco specifically supports the Status Conference Statement in so far as it asks for (a)  
7 clarification that the release provisions of each proposed plan, or any future amended plan, do not  
8 affect an involuntary eminent domain action or involuntary state takeover or other forced  
9 municipalization of PG&E and (b) a determination that it is not appropriate for either proposed plan,  
10 or any amended plan, to contain a provision preventing PG&E from negotiating sales of assets or any  
11 portion of its operating business, including settling an involuntary eminent domain action or  
12 involuntary state takeover or other forced municipalization of PG&E.

13 San Francisco agrees with the Valley Clean Energy Alliance that the no-sale provisions are  
14 unduly restrictive on the Reorganized Debtors and could very well be contrary to the interests of the  
15 Reorganized Debtors as well as their stakeholders. To the extent that there is a concern that a sale of  
16 assets or any portion of the Utility's operating business may be prejudicial to the Reorganized  
17 Debtors or their stakeholders, State law provides for regulatory review of the sales in order to consider  
18 the interests of stakeholders such as Utility ratepayers and employees (e.g., Ca. Pub. Utilities Code  
19 section 851).

20 **CONCLUSION**

21 For the reasons stated herein, San Francisco joins Valley Clean Energy Alliance in seeking  
22 preconfirmation consideration of these issues as set forth in this Partial Joinder.

23  
24 Respectfully submitted,

25 Dated: January 23, 2020

GREENE RADOVSKY MALONEY  
SHARE & HENNIGH LLP

26  
27 By: /s/ Edward Tredinnick  
28 Edward J. Tredinnick  
Attorneys for Creditor,  
City and County of San Francisco